

From: David Grober davidgrober1@gmail.com
Subject: Exhibits link - Exhibits chart for creating Joint Exhibits list
Date: October 9, 2019 at 6:55 PM
To: Puri, Ashe P. apuri@foxrothschild.com, Mark Young myoungpa@gmail.com, Bob Lauson bob@lauson.com, Lamar Treadwell lamar@treadwelltriallaw.com, Valerie Nichols valerie@lauson.com, David Grober davidgrober1@gmail.com



Gentlemen:

Please see the attached link for the documents referenced.

<https://www.dropbox.com/sh/bgg37vqwpq3juhl/AAC60FM244JBio34hODoQ9nca?dl=0>

Regards,
David Grober

Begin forwarded message:

From: David Grober <davidgrober1@gmail.com>
Subject: Re: Exhibits chart to start creating Joint Exhibits list
Date: October 9, 2019 at 6:01:41 PM PDT
To: "Puri, Ashe P." <apuri@foxrothschild.com>, Mark Young <myoungpa@gmail.com>, Lamar Treadwell <lamar@treadwelltriallaw.com>, Bob Lauson <bob@lauson.com>, Valerie Nichols <valerie@lauson.com>, David Grober <davidgrober1@gmail.com>

My error on the first sentence, should read October 15th.

On Oct 9, 2019, at 5:59 PM, David Grober <davidgrober1@gmail.com> wrote:

Gentlemen:

The Court order is for us to provide a joint exhibit list by March 15th.

Counsel are advised that they must further confer regarding exhibits. Parties must prepare an exhibit list with non-overlapping exhibit numbers, which removes any duplicate exhibits. Parties are further directed to group exhibits that are objected to on similar grounds. The parties should present their grouped objections by submitting a table that includes columns for (i) the objection, (ii) the exhibits impacted, (iii) the response to the objection, and (iv) an empty column for the Court's ruling. Counsel shall jointly file this table regarding grouped exhibit objections by October 15, 2019. Upon receiving this filing, the Court will consider whether the disputes should be referred to the Magistrate Judge.

We have been working on the joint exhibit list and are sending you the first 13 pages. Your exhibits are on the last page. We will be sending you the rest of the list shortly.


We are sending you a dropbox link which will match the names on the chart - those starting with TE, and which contain the exhibits so you can easily review them.

As this will be a process, and it is due on Tuesday, your quick review and objections on this first set of exhibits and the chart will further help to streamline any issues in the remaining exhibits and final chart creation. We are asking to get as much done this week, so that Monday and Tuesday are not a scramble.

Thank you.
We look forward to your response.

<191009_Joint Exhibit List V3 (vn).docx>

Regards,
David Grober

From: David Grober davidgrober1@gmail.com 

Subject: Trial Exhibits and creating Joint exhibit list

Date: October 10, 2019 at 6:18 PM

To: Puri, Ashe P. apuri@foxrothschild.com, Mark Young myoungpa@gmail.com, Dave Peck dpeck@coastlawgroup.com, Bob Lauson bob@lauson.com, Lamar Treadwell lamar@treadwelltriallaw.com, Valerie Nichols valerie@lauson.com, David Grober davidgrober1@gmail.com



Gentlemen:

This is a further update of exhibits, which are in the new link below, and which will be further supplemented tomorrow, but in the meantime, I hope you are starting a review and will provide your comments, objections, so that we can begin to get the joint report exhibit list created.

<https://www.dropbox.com/sh/er5as6nxnl6ifie/AADk39lzw2P26-LnM65IXL0Ja?dl=0>



191009_Joint
Exhibit...n).docx

Thank you.
David Grober

From: **David Grober** davidgrober1@gmail.com

Subject: **Exhibits & PTO jury video**

Date: **October 11, 2019 at 10:34 PM**

To: **Puri, Ashe P.** apuri@foxrothschild.com, **Mark Young** myoungpa@gmail.com, **Bob Lauson** bob@lauson.com, **Lamar Treadwell** lamar@treadwelltriallaw.com, **Dave Peck** dpeck@coastlawgroup.com, **Valerie Nichols** valerie@lauson.com, **David Grober** davidgrober1@gmail.com




Gentlemen.

We have reviewed the PTO video as requested by the Court, and approve its presentation to the Jury.
Your opinion?

We have not heard anything back from you on the exhibit list chart and exhibits we have submitted, and any objections to them, which is slowing the process of making the list and assembling the exhibits. Another update has been prepared and you have, or will be receiving the updated chart and exhibits link. We will continue to update the exhibits and list over the weekend and hope to hear from you.

Thank you.

David Grober

From: **David Grober** davidgrober1@gmail.com 

Subject: **Exhibit chart V6.1., and link to files.**

Date: **October 11, 2019 at 11:36 PM**

To: **Puri, Ashe P.** apuri@foxrothschild.com, **Mark Young** myoungpa@gmail.com, **Dave Peck** dpeck@coastlawgroup.com, **Bob Lauson** bob@lauson.com, **Valerie Nichols** valerie@lauson.com, **David Grober** davidgrober1@gmail.com



Gentlemen:

This is today's update for the joint exhibits list.



191009_Joint
Exhibit...).docx

Please use the link below to access this update.

| <https://www.dropbox.com/sh/er5as6nxnl6ifie/AADk39Izw2P26-LnM65IXL0Ja?dl=0>

Sincerely,
David Grober
(310) 951-1110

From: **David Grober** davidgrober1@gmail.com 

Subject: Updated joint exhibits list and dropbox link.

Date: October 13, 2019 at 10:56 PM

To: Puri, Ashe P. apuri@foxrothschild.com, Mark Young myoungpa@gmail.com, Bob Lauson bob@lauson.com, Lamar Treadwell lamar@treadwelltriallaw.com, Valerie Nichols valerie@lauson.com, David Grober davidgrober1@gmail.com



Gentlemen:

This is update for the joint exhibits list.



191009_Joint
Exhibit...0.docx

Please use the link below to access this update.


<https://www.dropbox.com/sh/er5as6nxnl6ifie/AADk39Izw2P26-LnM65IXL0Ja?dl=0>

We have been working on this and sending you updates since Wednesday and asking for your input, and as yet received nothing. Hope to hear from you soon.

Sincerely,

David Grober

(310) 951-1110

From: **David Grober** davidgrober1@gmail.com 
Subject: Plaintiff Objections



Date: October 14, 2019 at 10:53 AM

To: Puri, Ashe P. apuri@foxrothschild.com, Chris Polychron cpolychron@coastlawgroup.com, Mark Young myoungpa@gmail.com,
Bob Lauson bob@lauson.com, Lamar Treadwell lamar@treadwelltriallaw.com, Valerie Nichols valerie@lauson.com,
David Grober davidgrober1@gmail.com

Gentlemen:

Here is the Plaintiff objections to the exhibits.
We would appreciate hearing from you.



Joint
Objections.docx

David Grober
(310) 951-1110

From: David Grober davidgrober1@gmail.com 
Subject: Joint exhibit list.

Date: October 15, 2019 at 11:45 AM

To: Puri, Ashe P. apuri@foxrothschild.com, Mark Young myoungpa@gmail.com, Chris Polychron cpolychron@coastlawgroup.com, Bob Lauson bob@lauson.com, Lamar Treadwell lamar@treadwelltriallaw.com, Valerie Nichols valerie@lauson.com, David Grober davidgrober1@gmail.com



Gentlemen:

It is now October 15th at 11:30 a.m. and we have still not heard from you regarding the joint exhibit list, nor any comments or objections to our exhibits that we have been providing you for the past six days. I have emailed you at all three law firms multiple times since last Wednesday. In following the Court's order, we were also supposed to meet and confer, and to our multiple requests to hear back from you on that, have heard nothing.

With only hours remaining before the document is due, we are proceeding to create it and will file it to be timely with the Court. We presume that you have no objections. If you do, we will do what we can to have it be a joint report, however that may be limited with the remaining time.

Attached, as before, is the Joint exhibit list and the link to those documents should you wish to comment. Our previously sent objections to your previously designated exhibits are attached here again as well.



191009_Joint
Exhibit...11.docx



Joint
Objections.docx

<https://www.dropbox.com/sh/er5as6nxnl6ifie/AADk39Izw2P26-LnM65IXL0Ja?dl=0>

Regards,
David Grober